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U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

EMN:SPN
F. #2014R01283

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

- against -

MOUAFAB AL SABSABI,
also known as
"Abu Mazen,"

Defendant.

-----X

THE GRAND JURY CHARGES:

INDICTMENT

CR 14 - 00583

Cr. No.

(T. 18, U.S.C., §§ 371, 470, 473,
981(a)(1)(C), 982(a)(2)(B), 2 and 3551 et
seq.; T. 21, U.S.C., § 853(p); T. 28, U.S.C.,
§ 2461(c))

TOWNES, J.

LEVY, M.J.

COUNT ONE

(Conspiracy to Sell Counterfeited Currency)

1. In or about and between September 2011 and August 2014, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MOUAFAB AL SABSABI, also known as "Abu Mazen," together with others, did knowingly and willfully conspire to sell, exchange, transfer and deliver false, forged and counterfeited obligations of the United States, to wit: counterfeited United States currency, with the intent that the same be passed, published and used as true and genuine, contrary to Title 18, United States Code, Sections 470 and 473.

2. In furtherance of the conspiracy and to effect its objects, the defendant MOUAFAK AL SABSABI, also known as "Abu Mazen," together with others, committed and caused to be committed, among others, the following:

OVERT ACTS

a. In or about June 2014, AL SABSABI brought approximately \$4,000 in counterfeited United States currency into the United States through John F. Kennedy International Airport in Queens, New York.

b. On or about July 8, 2014, AL SABSABI sold approximately \$4,000 in counterfeited United States currency to an undercover law enforcement agent, which sale took place within the Eastern District of New York.

c. On or about August 7, 2014, AL SABSABI spoke with a co-conspirator whose identity is known to the Grand Jury.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT TWO

(Dealing in Counterfeited Currency)

3. On or about July 8, 2014, within the Eastern District of New York and elsewhere, the defendant MOUAFAK AL SABSABI, also known as "Abu Mazen," together with others, did knowingly and intentionally sell, exchange, transfer and deliver false, forged and counterfeited obligations of the United States, to wit: approximately \$4,000 in counterfeited United States currency, with the intent that the same be passed, published and used as true and genuine.

(Title 18, United States Code, Sections 470, 473, 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT ONE

4. The United States hereby gives notice to the defendant that, upon his conviction of Count One, the government will seek forfeiture in accordance with 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), which require the forfeiture of any property constituting or derived from proceeds traceable to his violation of 18 U.S.C. § 371.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT TWO

6. The United States hereby gives notice to the defendant that, upon his conviction of Count Two, the government will seek forfeiture in accordance with 18 U.S.C. § 982(a)(2)(B), which requires the forfeiture of any property constituting or derived from

proceeds the person obtained directly or indirectly as the result of his violation of 18 U.S.C. § 473.

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;


it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 982(a)(2)(B); Title 21, United States Code, Section 853(p))

A TRUE BILL



FOREPERSON



LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #2014R01283
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

MOUAFAB AL SABSABI, also known as "Abu Mazen,"

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 371, 470, 473, 981(a)(1)(C), 982(a)(2)(B), 2 and 3551
et seq.; T. 21, U.S.C. § 853(p); T. 28, U.S.C. § 2461(c))

A true bill.

✓

W. Wright

Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Samuel P. Nitze, Assistant U.S. Attorney (718) 254-6465